

CORPORATE SOCIAL RESPONSIBILITY (CSR) POLICY

General

Dawnus has followed the guidance provided by ISO 26000 Social Responsibility Standard, implementing social responsibility into the organisation across all levels. The Company recognises that we must integrate our business values and operations to meet the expectations of our stakeholders including clients, employees, suppliers, the environment and the community. We aim to be a good corporate citizen in all of our undertakings and are committed to meeting our obligations as a responsible contractor. This policy will be made available to all employees, clients and other interested parties and will be reviewed regularly to ensure standards are being maintained.

The maintenance of this policy is the responsibility of our Group Technical Director Russell Evans. Russell is a Group Board Director and the Director responsible for Safety, Health Environment & Quality (SHEQ) and Corporate Social Responsibility, including the delivery of community and employment benefits across the company. All Directors and Managers are responsible for ensuring that the principles set out in this policy are communicated to, understood and observed by all employees. All team members are required to adhere to this policy and report any suspected breach to their line manager or senior management. The Company will take disciplinary action against any employee who takes negative action including retribution, retaliation or harassment against an employee who reports a concern in good faith.

This policy is underpinned by the Dawnus Business Management System (BMS) and is issued in conjunction with Company Policies including but not limited to our Health and Safety, Training and Development, Environmental, Sustainability, Grievance, Ethical Code of Conduct and Equality, Diversity and Inclusion Policies.

Business Ethics

The following ethics represent the minimum standards to which the Company will adhere in all its undertakings:

- We will conduct every aspect of our business in the spirit of honesty, integrity, openness and partnership;
- We will respect the human rights and interest of our employees, clients, neighbours, communities and third parties;
- We will respect the legitimate interests of all parties with whom we deal.

Community Benefits

Dawnus is committed to providing Community Benefits on all our projects, and recognises the important role the company plays when working in local communities. Delivering community benefits is embedded in our company culture and we always strive to deliver something positive to the community during construction and positively contribute to the social, economic and environmental well-being of local communities where we work.

In order to deliver community benefits and maintain good relationships with local people and communities, Dawnus will:

- Recognise that construction work can cause disturbances to local businesses and residents, and work to reduce the impact that our activities have on the surrounding area;
- Ensure that contact points are established and made clearly identifiable to ensure clear communication between the Company and members of the public;
- Maintain a commitment to supporting local communities and charities, particularly those where we can add particular value to their activities, for example training and return to employment for those who have a history of long-term unemployment;
- Play an active part in local communities to maximise the learning and development opportunities afforded by our work;
- Establish relationships with local education establishments and voluntary services to maximise the learning and development opportunities afforded with our work;
- Manage our operations and safeguard our employees and others by maintaining the highest standards of health, safety and well-being.
- Offer employment and training opportunities for local people, including those from the long term unemployed and other disadvantaged groups.
- Promote supply chain opportunities for new and small enterprises, and work with SMEs to upskill and train.

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Employees

Dawnus believes that success can only be achieved through attracting and developing the best employees. The Company aims to create a working environment which allows all employees to reach their full potential, and promotes a culture of Fairness, Inclusion and Respect (FIR). Dawnus aims to:

- Provide employment and training opportunities to local people and provide long-term prospects for continued employment when contracts come to an end;
- Provide employees with challenging and rewarding work, while recognising that they need sufficient time to enjoy well-rounded, satisfying lives;
- Offer a comprehensive benefits package to all employees, to increase employee satisfaction and encourage long-term retention of staff;
- Develop all employees to their full potential by offering training and career development opportunities. These are available to all job types and skill levels, and encompass a wide range of disciplines, from site health and safety training to internal graduate development schemes;
- Support employees as far as possible with their personal learning goals by providing, where appropriate, time off for study, course fees, books etc;
- Provide training to all employees in accordance with the Company Equality, Diversity and Inclusion and Training and Development Policies;
- Respect the right of employees to join a trade union.
- Promote FIR culture across the business with FIR Ambassadors appointed to help achieve this.
- Ensure that all employees and job applicants are treated equally and provided equal pay to men and women for the same work, as outlined in our Equal Pay Policy.
- Offer all employees the right to request flexible working, recognising that greater flexibility with regard to work patterns can be beneficial to both employees and the Company

Environment

Dawnus recognises its responsibility to manage the impact of its activities on the environment, and the Company is committed to best environmental practice. In order to minimise any negative effects its activities have on the environment. Our Environmental Management Policy and Procedures provide a framework in which we conduct our operations. Dawnus will:

- Adhere to its Environmental Management System, based on ISO 14001;
- Comply with all applicable legislation, standards and practices, and the specific requirements of our clients and regulatory bodies;
- Adopt best practice and, where possible, assist in developing innovative solutions to environmental problems and issues;
- Ensure that all our works have been reviewed for possible impact on the natural habitat, minimising energy use by using efficient equipment and well-insulated site accommodation;
- Ensure projects minimise waste and segregates waste suitable for recycling;
- Reduce the production of waste and develop effective waste management and recycling procedures;
- Establish environmental targets and objectives, and monitor performance against these targets.

Equal Opportunities

Dawnus is committed to providing a fair workplace and has developed a culture of Fairness, Inclusion and Respect (FIR). Dawnus operates an Equality, Diversity and Inclusion Policy that applies to all aspects of employment, from recruitment to dismissal. In line with this policy Dawnus will ensure that:

- No one receives less favourable treatment on grounds of race, colour, ethnic or national origin, religion or belief, sex, sexual orientation, marital status or maternity-related reasons, disability, age, or trade union membership or activity;
- The organisation is free of conduct that violates the dignity of employees, or creates an intimidating, hostile, degrading, offensive, or humiliating environment;
- Opportunities for employment, training, or promotion are open to all employees equally, regardless of race, colour, ethnic or national origin, religion or belief, sex, sexual orientation, marital status or maternity-related reasons, disability, age, or trade union membership or activity;
- Selection for employment, promotion, transfer and training, or access to benefits, facilities and services will be based solely on merit.

General Data Protection Regulation

We will comply with Data Protection laws and regulations of any country in which we operate. CSR Information is held in accordance with the Company's Data Protection Policy and is subject to the rules and provisions of the Data Protection Act 1998 and General Data Protection Regulation 2018.

Health, Safety and Wellbeing

Dawnus is committed to promoting and maintaining the highest degree of safety and the physical, mental and social well-being of our employees. It is of the utmost importance that health, safety and well-being standards are maintained for all of Dawnus' activities and all its work locations. Dawnus recognises that construction work carries many risks and that health, safety and well-being must be central to the Company's vision. Dawnus will therefore:

- Maintain an Occupational Health and Safety Management System, based on OHSAS 18001 and appoint a Director to be responsible for this system;
- Carry out hazard identification, risk assessment and control with suitably experienced and competent personnel;
- Comply with all applicable legislation, standards and practices, and the specific requirements of our clients and regulatory bodies;
- Maintain a training programme to ensure all employees are able to carry out their duties safely and competently, and ensure all employees are aware of their responsibility for maintaining health, safety and well-being;
- Communicate to all employees the risks and controls associated with their work, and their responsibilities for effecting these controls;
- Address health, safety and well-being as an agenda item at all Board Meetings to ensure that all objectives and targets are being met.
- Conduct an annual Health & Wellbeing campaign, which involves awareness training on various topics, including information of hazards and controls and precautions which should be taken to help protect individuals and others.

Human Rights

We will respect the human rights of our employees, supply chain and all third parties with whom we have dealings.

We will ensure that as a minimum the following standards are met and adhered to:

- We will not employ any child, forced or bonded labour or have dealings with any company which does;
- We will adhere to the non-discrimination laws of any country in which we operate;
- We will not condone the use of physical or mental coercion or abuse and will take action against any employee deemed to be defying this policy;
- We will respect the rights of individuals to confidentiality of personal information kept by the Company;
- We provide staff with a non-discriminatory grievance procedure which they may invoke if they have a grievance about any aspect of their employment.

Procurement

We are committed to using local and sustainable resources and where all other factors remain equal will use local suppliers or local branches of national companies. We are committed to procuring goods and services which have not jeopardized human rights, safety or the environment.

We will:

- Look to enter into long term trading agreements with supply chain partners;
- Develop and maintain a strong local supply chain for input into design / planning phases, and for local sourcing of services and materials;
- Focus on re-used, recycled or sustainable sources; research and propose sustainable alternatives where possible;

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- Expect all suppliers to adhere to business principles and ethical standards similar to our own and in accordance with legislation;
- Only work with suppliers who have acceptable health, safety and well-being, environmental, quality social and legal standards;
- Only purchase timber from legal and well managed forest which are certified under third party schemes (preferably the FSC) and have valid chain of custody certification;
- Require all waste disposal companies to carry a licence under the Controlled Waste (Registration of Carriers and Seizure of Vehicles) Regulations 1991.

Sustainability

We are committed to delivering sustainable construction within our business. In line with the guidance provided by ISO 26000 Social Responsibility Standard we will:

- Be accountable for our impacts on society, the economy and the environment, with an obligation on management to be answerable for the overall impact on decisions and activities.
- Present clear and accurate information on policies, decisions and activities that are likely to have an impact on society and the environment, including performance on social responsibility.
- Actively promote ethical behaviour, identifying and communicating core company values and principles, which are based on honesty, equity and integrity.
- Ensure respect for all Stakeholder and community interests, considering the views of stakeholders who interests are likely to be affected by a decision made by us.
- Comply with all legal requirements and have respect for the rule of the law.
- Ensure respect for international norms of behaviour and all human rights

Our Sustainability Policy is based around the fundamental tenets of Dawnus being a regional business with significant use and development of local resources and the inherent community involvement. The Policy sets out our commitment in the following areas: Sustainable Consumption Production; Climate Change and Energy; Natural Resources and Enhancing the Environment; and Creating Sustainable Communities.

We are also developing our business in line with the principals of The Circular Economy and BS8001.



Nick Down
Group Managing Director
Dawnus Group Ltd
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